

## LINDA MORENO

Admitted *Pro Hac Vice*  
California State Bar No. 92854  
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Attorney for MOHAMED MOHAMED MOHAMUD

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

)

**Plaintiff,**

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V.

) No. 10CR4246-JM

) Judge Jeffrey T. Miller

**) UNOPPOSED MOTION FOR  
 ) EXTENSION OF TIME TO  
 ) FILE PRETRIAL MOTION**

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#### Defendants.

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**DEFENDANT MOHAMED MOHAMED MOHAMUD'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE PRETRIAL MOTIONS**

PLEASE TAKE NOTICE that Defendant, MOHAMED MOHAMED MOHAMUD, by his attorney, LINDA MORENO, respectfully moves this Court for an extension of time to Tuesday, December 13, 2011, within which to file Pretrial Motions. In support of this motion the Defendant states as follows:

1. Defense counsel has been traveling for several days and failed to pack voluminous hand written notes gathered in client interviews, necessary for consideration in a final resolution of any motions to be filed, which are not duplicative of those filed by co counsel. Defense counsel will be able to review notes upon her return home Tuesday, December 13, 2011.

2. Defendant conferred with Assist. U.S. Attorney William P. Cole and he has no objection.
- 1      3. Granting this extension will not delay other filing deadlines currently set by the court.
- 2      4. This motion is made in good faith and not for purposes of delay.

3      Dated: December 11, 2011

4      New York, New York

5      Respectfully submitted,

6                    /s/ Linda Moreno  
7                    **LINDA MORENO**  
8                    LINDA MORENO P.A.  
9                    P.O. Box 10985  
Tampa, Florida 33679  
Attorney for Mohamed Mohamed Mohamud

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

BASAALY SAEED MOALIN,

MOHAMED MOHAMED MOHAMUD.

ISA DOREH.

AHMED NASIR TAALIL MOHAMUD.

### Defendants.

No. 10CR4246-JM  
Judge Jeffrey T. Miller  
CERTIFICATE OF SERVICE

No. 10CR4240 JM  
Judge Jeffrey T. Miller

Judge Jeffrey T. Miller  
CERTIFICATE OF SERVICE

I, Linda Moreno, declare as follows:

I am a citizen of the United States and am over eighteen years of age. My business address is P.O. Box 10985, Tampa, Florida 33679, telephone number (813) 247-4500. I am not a party to the above-entitled action.

On December 11, 2011, I served the referenced Motion for Extension of Time to file pretrial motions electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them, on the following persons:

1. Assist. U.S. Attorney William P. Cole
2. Assist. U.S. Attorney Caroline Pineda Han
3. Joshua Dratel (Defendant 1)
4. Alice L. Fontier (Defendant 1)
5. Ahmed Ghappour (Defendant 3)
6. Thomas Durkin (Defendant 4)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2011.

New York

/s/ Linda Moreno

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**LINDA MORENO**

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Attorney for Mohamed Mohamed Mohamud